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March 14, 1996

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

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RE: CS Docket No. 95-184; FCC 95-504, Telecommunications Inside  
Wiring, Customer Premises Equipment

Dear Mr. Caton:

Please accept the following comments regarding several issues  
before the FCC.

A.) Service Provider Access to Private Property:

- \* Property managers support the goal of telecommunications reform legislation-- to foster increased competition among service providers, but do not believe that service providers should be given unrestricted access to buildings. Access to private property by large numbers of communications companies may inadvertently and unnecessarily adversely affect the conduct of business by undermining property managers' ability to responsibly manage complex building systems; ensure service reliability and tenant safety; compliance with safety codes; as well as needlessly raise additional legal issues.
- \* Unlimited access could also require building owners and managers to guarantee building access to a potentially unlimited number of service providers and assume much, if not all, of the costs and liabilities associated with such access. Existing buildings have limited space available for installation and maintenance of telecommunications systems. Unlimited access could force owners to incur exorbitant costs for expansion and renovation of riser cable space.
- \* A property manager or building owner must have control over the space occupied by telephone lines and facilities, especially in a multi-occupant building, because only the property manager can coordinate the conflicting needs of multiple tenants/residents and multiple service providers.

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- \* Property managers believe that owners and managers of residential and commercial buildings should have the right to choose and control the telecommunications systems serving their tenants and facilities. For all forms of telecommunications system installation, maintenance and service, entry into private property should be provided pursuant to a negotiated agreement between the property owner/manager and the service provider--not by legislative fiat. Negotiation on a competitive basis will allow for consideration of the level of expertise, professionalism and reputation of the potential service provider. Owners should have the right to negotiate mutually accepted terms and conditions for granting access to building space and the valuable tenant markets contained within.
  - \* Property managers feel that owners/managers should be compensated for granting access to their multifamily projects and for any actual damage incurred while the multifamily project is being wired for cable and/or any other similar system. The compensation for granting access could be in the form of one payment or multiple payments over time.
- B.) Demarcation Point:
- \* Consideration should be given to the nature of the property, and not the specific technology involved. There should be a uniform demarcation point for all commercial properties (inside the premises, preferably at the telephone vault or frame room), and a different demarcation point for residential properties (outside the building).
- C.) Connections:
- \* Government action in issuing technical standards for connections is unnecessary--the telecommunications industry established standards that are widely followed.
- D.) Regulation of Wiring:
- \* As consumers rather than providers of telecommunications, we cannot state the merit of one configuration of inside wiring over another. While it should definitely be noted that there are differences between types of buildings (residential, commercial, etc...) which allows for the consideration of the differences in technology, it may not make sense to adopt uniform rules for all kinds of property types.

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E.) Customer Access to Wiring:

- \* Property managers are concerned that the existing communication system be kept intact when an existing licensee is terminated from servicing a given multifamily project in order to avoid additional property damage and work. The terminated licensee should negotiate with the new licensee as to the use of the existing equipment while keeping the owner/property manager informed of the negotiations.
- \* The property manager should retain the right to obtain access to the wiring and control the type and placements of such wiring and should have a superseding right to acquire or install any wiring.

Sincerely,

LOCKWOOD REALTY, INC.



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